

Laurel I. Handley (NV Bar # 9576)
Jory C. Garabedian (NV Bar # 10352)
ALDRIDGE PITE, LLP
520 South 4th St., Suite 360
Las Vegas, Nevada 89101
Telephone: (858) 750-7600
Facsimile: (702) 685-6342
E-Mail: lhandley@aldridgepite.com

Attorneys for Defendant:
Rushmore Loan Management Services, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SANDRA L. SHEWBERT,
Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,
LLC; SHELLPOINT MORTGAGE
SERVICING; RUSHMORE LOAN
MANAGEMENT; AMERICAN HONDA
FINANCE CORP; HYUNDAI MOTOR
FINANCE,

Defendants.

Case No. 2:19-cv-00296-APG-GWF

**STIPULATION AND ORDER TO EXTEND
TIME TO FILE RESPONSE TO
AMENDED COMPLAINT**

Second Request

Defendant Rushmore Loan Management Services, LLC ("Rushmore") and Plaintiff Sandra L. Shewbert ("Plaintiff" and collectively the "Parties"), by and through their undersigned attorneys of record, hereby stipulate and agree as follows:

1. On April 16, 2019, Plaintiff filed her First Amended Complaint. (ECF No. 9).
2. Rushmore was served with the First Amended Complaint and Summons on April 17, 2019, thereby making Rushmore's initial response due May 8, 2019.
3. The Court granted the Parties' first stipulation to extend time to file a response to the First Amended Complaint thereby making the current deadline May 31, 2019. (See ECF No. 22).

1 4. The Parties agree and submit their second request to extend the response deadline
2 through June 14, 2019 to further consider early resolution before an answer or other
3 responsive pleading is filed. Counsel for Plaintiff is scheduled to meet with Plaintiff
4 on Friday June 7, 2019 to further consider early resolution.

5 5. This request and stipulation is the second request, and is not being made for purposes
6 of delay or prejudice.

7 DATED this 31st day of May, 2019.

8 ALDRIDGE PITE, LLP

HAINES & KRIEGER, LLC

9 */s/ Jory C. Garabedian*

/s/ David H. Krieger

10 Jory C. Garabedian
11 Nevada Bar No. 10352
12 *Attorney for Defendant*
13 *Rushmore Loan Management Services, LLC*

David H. Krieger
Nevada Bar No. 9086
Attorney for Plaintiff
Sandra L. Shewbert

14 **IT IS SO ORDERED:**

15
16 
17 U.S. MAGISTRATE JUDGE

18 DATED: 6/3/2019
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I, the undersigned, declare: I am, and was at the time of service of the papers herein referred to, over the age of 18 years, and not a party to this action. My business address is 4375 Jutland Drive, Suite 200, P.O. Box 17935, San Diego, CA 92177-0935.

I hereby certify that on May 31, 2019, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Shawn Wayne Miller
Haines & Krieger, LLC
8985 S. Eastern Avenue, Suite 350
Las Vegas, NV 89123
Email: smiller@hainesandkrieger.com
Attorney for Plaintiff

David H. Krieger
Haines & Krieger, LLC
8985 S. Eastern Avenue, Suite 350
Henderson, NV 89123
Email: dkrieger@hainesandkrieger.com
Attorney for Plaintiff

Jeremy J. Thompson
Clark Hill PLLC
3800 Howard Hughes Parkway, Suite 500
Las Vegas, NV 89169
Email: jthompson@clarkhill.com
Attorney for Defendant Equifax Information
Services, LLC

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 31st day of May, 2019, at San Diego, California.


Marsha L. Johnson